

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re Entresto (Sacubitril/Valsartan) Patent
Litigation

C.A. No. 20-2930-RGA

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

MSN PHARMACEUTICALS INC., MSN
LABORATORIES PRIVATE LIMITED, MSN
LIFE SCIENCES PRIVATE LIMITED,

Defendants.

C.A. No. 19-2053-RGA

**DEFENDANTS' RENEWED MOTION UNDER RULES 59 AND 60 FOR VACATUR OR
AMENDMENT OF THE COURT'S FINAL JUDGMENT AND
RENEWED MOTION UNDER RULES 59 AND 15 TO
RE-OPEN THE JUDGMENT AND FOR LEAVE TO AMEND THE PLEADINGS**

Defendants MSN Pharmaceuticals Inc., MSN Laboratories Private Limited, and MSN Life Sciences Private Limited (collectively, "MSN") respectfully renew its motion under Federal Rules of Civil Procedure 59(e) and 60(b)(5) and (6) for an Order granting vacatur and relief from its April 1, 2025 Final Judgment (D.I. 1824). MSN further renews its motion under Federal Rule of Civil Procedure 15(b) for leave to file its amended counterclaim after this Court re-opens the record pursuant to Rule 59(a)(2). A clean version of the amended Answer is attached as Exhibit 1 and a black-lined version (comparing the amended Answer to the previously-filed Answer) is attached as Exhibit 2. The grounds for MSN's motion are stated in the accompanying opening brief and the supporting materials filed herewith. Pursuant to D. Del. LR 7.1.1, counsel for MSN contacted counsel for Novartis about the contents of this motion and Novartis's counsel was silent as to whether Novartis is opposed to the relief requested.

Pursuant to D. Del. LR 7.1.1, counsel for the parties previously met and conferred regarding the substance of this motion prior to the filing of the original motions; Plaintiff opposed.

Respectfully submitted,

STAMOULIS & WEINBLATT LLC

Dated: April 2, 2025

By: /s/ Richard C. Weinblatt

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Attorneys for Defendants MSN Pharmaceuticals, Inc., MSN Laboratories Private Limited, and MSN Life Sciences Private Limited

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2025, I electronically filed the above document(s) with the Clerk of Court using CM/ECF which will send electronic notification of such filing(s) to all registered counsel.

/s/ Richard C. Weinblatt

Richard C. Weinblatt #5080